

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

(al-1316)

-----X
DIOCELYN BATISTA,

Plaintiff,

Civil Action No.:
7:18-cv-07681-CM

-against-

NOTICE OF MOTION

IRON MOUNTAIN INFORMATION MANAGEMENT
SERVICES, INC. and ROBERT E. GOINS,

Defendants.

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED

DOE #:

DATE FILED: 9/27/2022

MOTION BY: Defendant Iron Mountain Information Management
Services, Inc. And Robert E. Goins

SUPPORTING PAPERS: Declaration in Support of Defendants' Motion in
Limine, dated May 6, 2022, all exhibits annexed
thereto; supporting Memorandum of Law; and all
prior pleadings and proceedings heretofore had
herein.

**RETURN DATE,
TIME AND
PLACE:** At the United States District Court, Southern
District of New York, at the Courthouse thereof,
located at: 500 Pearl Street, New York, New York
10007-2550 before The Honorable Judge McMahon on
a date to be determined by the Court.

RELIEF SOUGHT: An Order pursuant to Federal Rules of Evidence,
Federal Rules of Civil Procedure 26(a) and Local
Rule 7.1, precluding plaintiffs' expert Scott
Haig, M.D. from offering any testimony, reports
or opinions at trial; and granting such other and
further relief as this Court may deem just and
proper.

ANSWERING PAPERS: Pursuant to the Judge's Rules, answering papers,
if any, are required to be served within five (5)
days of this filing.

MEMO ENDORSED

9/26/2022
asking plaintiff's expert
his expert a couple of months
late & let occurred in
2019. defendant has his
notice of plaintiff's
expert for three years
and the court would
if asked, have
responded disney
for a deposition
Southern Dr.
As to plaintiff's
physician, he can
submit an affidavit
to his opinion

under Rule 701.
Motion denied. Caller: khl

Dated: Hauppauge, New York
May 6, 2022

Respectfully submitted,
SIMMONS JANNACE DELUCA, LLP

By: 

Allison C. Leibowitz
Attorneys for Defendants IRON
MOUNTAIN INFORMATION MANAGEMENT
SERVICES, INC. and ROBERT E. GOINS

Office & P.O. Address:

43 Corporate Drive
Hauppauge, New York 11788
(631) 873-4888

TO: JenniElena Rubino, Esq.
RUBINO LAW FIRM, P.C.
Attorneys for Plaintiff
Office & P.O. Address:
P.O. Box 867
Yonkers, New York 10702
(212) 682-2375

588169